

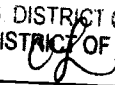
AO 91 (Rev. 08/09) Criminal Complaint

**FILED****UNITED STATES DISTRICT COURT**

for the

Western District of Texas

OCT 31 2019

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

United States of America )

v. CRUZ, Kimberly )

7/7/1988 )

San Antonio, TX )

Defendant(s)

Case No. DR:19-9125M-01

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10-29-2019 in the county of Maverick in the  
Western District of Texas, the defendant(s) violated:

Code Section	Offense Description
18 USC 1001 (a)(2)	makes any materially false, fictitious, or fraudulent statement or representation

This criminal complaint is based on these facts:

On October 29, 2019, Homeland Security Investigations (HSI) Eagle Pass Special Agents (SAs) arrested Kimberly Ann CRUZ for violating 18 USC 1001, making false statements. CRUZ was encountered by US Customs and Border Protection Officers (CBPOs) at the Eagle Pass Port of Entry #1 when CRUZ requested humanitarian paroles for five (5) Mexican Nationals. According to CBPOs, CRUZ identified herself as working as an Immigration and Customs Enforcement (ICE) Enforcement and Removal Office (ERO) employee and stated she would be transporting the 5 subjects to the US Citizenship and Immigration Service (USCIS) office in San Antonio, Texas. Through investigation, SAs concluded the 5 subjects were going to be transported to family members waiting in San Antonio and CRUZ was not a federal employee, nor working on behalf of a federal agency. The preliminary findings were relayed to Assistant United States Attorney (AUSA) Jody Gilzene, who accepted prosecution on CRUZ.

☐ Continued on the attached sheet.


Sworn to before me and signed in my presence.

Date: 10/31/2019City and state: Del Rio, Texas

Complainant's signature

Special Agent Matthew Peele

Printed name and title

  
Judge's signatureUnited States Magistrate Judge  
Printed name and title**Victor Roberto Garcia**  
**U.S. Magistrate Judge**